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| 8  | UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE |  |
| 9  | AI SEAI  | ILE                                      |
| 10 | DOUG BRIGGS, individually and as Personal Representative of THE        | CASE NO. C21-740 MJP                     |
| 11 | ESTATE OF BARBARA DREYFUSS,  | ORDER ON OBJECTIONS IN CORTEZ DEPOSITION |
| 12 | Plaintiff,   | CORTEZ DEI OSITION                       |
| 13 | v.   |  |
| 14 | LIFE CARE CENTERS OF<br>AMERICA, INC., LAKE VUE                        |  |
| 15 | OPERATIONS, LLC, ELLIE<br>BASHAM,                                      |  |
| 16 | Defendants.  |  |
| 17 | DARCY KOVACS, individually and as                                      |  |
| 18 | Personal Representative of THE ESTATE OF ROBIN HAMRICK,                |  |
| 19 | Plaintiff,   |  |
| 20 | v.   |  |
| 21 | LIFE CARE CENTERS OF<br>AMERICA, INC., LAKE VUE                        |  |
| 22 | OPERATIONS, LLC, ELLIE BASHAM,   |  |
| 23 | ·  |  |
| 24 | Defendants.  |  |

| 1  | This matter comes before the Court on the Parties' Objections lodged during the            |  |
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| 2  | deposition of Alice Cortez, which has been designated for trial in lieu of live testimony: |  |
| 3  | 1. The Court OVERRULES the objection on page 39:13-16.                                     |  |
| 4  | 2. The Court SUSTAINS the objection on page 40:4-17.                                       |  |
| 5  | 3. The Court SUSTAINS, in part, the objection and strikes the testimony from page          |  |
| 6  | 81:23 after the words "and she told me[.]" through page 82:8.                              |  |
| 7  | 4. The Court SUSTAINS, in part, the objection and strikes the testimony on page            |  |
| 8  | 83:18-20 and 83:23–84:4.   |  |
| 9  | 5. The Court SUSTAINS the objection on page 84:3-4.  |  |
| 10 | 6. The Court SUSTAINS the objection on page 84:7-14.                                       |  |
| 11 | 7. The Court SUSTAINS the objection on page 84:7-14.                                       |  |
| 12 | 8. The Court OVERRULES the objection on page 92:24–93:22.                                  |  |
| 13 | 9. The Court OVERRULES the objection on page 99:4-7.                                       |  |
| 14 | 10. The Court OVERRULES the objection on page 99:23.                                       |  |
| 15 | 11. The Court OVERRULES the objection on page 100:18.                                      |  |
| 16 | 12. The Court OVERRULES the objection on page 101:4.                                       |  |
| 17 | 13. The Court OVERRULES the objection on pages 104:21–105:8.                               |  |
| 18 | The clerk is ordered to provide copies of this order to all counsel.                       |  |
| 19 | Dated May 15, 2023.  |  |
| 20 | Janal 10   |  |
| 21 | Jamal N. Whitehead United States District Judge  |  |
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